

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

True Names, Ltd. d/b/a Ethereum Name
Service, a Singapore corporation, and Virgil
Griffith, an individual.

Plaintiffs,

v.

GoDaddy, Inc., a Delaware corporation;
GoDaddy.com LLC, a Delaware
corporation; Dynadot LLC, a California
corporation; and Manifold Finance, Inc., a
Delaware corporation.

Defendants.

Case No. 2:22-cv-01494-JJT

**[PROPOSED] TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION**

BEFORE THE COURT is the Ex Parte Motion for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction (Dkt. 2), filed by Plaintiff True Name, Ltd. d/b/a Ethereum Name Service (“True Names”) and Virgil Griffith (collectively “Plaintiffs”), on September 5, 2022 (the “Motion”). The Court has reviewed the Motion and its exhibits, the Complaint (Dkt. 1) and its exhibits, and considered the applicable law. Being thereby fully advised in the premises, the Court hereby ORDERS as follows:

IT IS HEREBY ORDERED the Motion is GRANTED.

IT IS FURTHER ORDERED that Defendants GoDaddy, Inc. and GoDaddy.com LLC (collectively “GoDaddy”), its officers, agents, directors, affiliates, servants, employees, and all persons acting in concert with it are HEREBY ENJOINED from directly or indirectly causing the expiration of the eth[.]link domain name (the “Domain”) or allowing the Domain to revert to the registry to be generally available for purchase by third parties.

IT IS FURTHER ORDERED that Defendants GoDaddy are HEREBY ENJOINED from preventing or frustrating Plaintiffs’ right, pursuant to the Domain Name Registration Agreement with GoDaddy, to renew the registration of the Domain.

IT IS FURTHER ORDERED that Defendants GoDaddy, Dynadot, and Manifold Finance, Inc. (collectively “Defendants”), their officers, agents, directors, affiliates, servants, employees, and all persons acting in concert with them are HEREBY ENJOINED from selling or otherwise transferring ownership interest in the Domain to any party, or purchasing or accepting ownership interest in the Domain.

IT IS FURTHER ORDERED that an order to show cause why a preliminary injunction should not issue, pursuant to Fed. R. Civ. P. 65, enjoining Defendants from directly or indirectly committing the above-described acts during the pendency of this action.

ORDER SETTING PRELIMINARY INJUNCTION HEARING

UPON CONSIDERATION of Plaintiffs’ Motion, the Memorandum of Points and Authorities, the supporting declarations and exhibits, the papers and pleadings on file, and for good cause shown:

1. The Court sets the hearing for Plaintiffs’ Motion for Preliminary Injunction for _____, 2022 at _____ a.m./p.m. in Courtroom _____ at the Sandra Day O’Connor U.S. Courthouse, 401 West Washington Street, Phoenix, AZ 85003.
2. Further, the Court sets the following briefing schedule relating to Plaintiffs’ Motion:

- 1 a. Defendants shall file and serve opposition papers and respond to this
2 Court's Order to Show Cause as to why a preliminary injunction
3 should not issue by _____, 2022; and
4 b. Plaintiffs shall file and serve its reply brief by _____,
5 2022.

6 IT IS SO ORDERED.
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